



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
 REGION 5
 77 WEST JACKSON BOULEVARD
 CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

LU-9J

Sent by Certified Mail # 7009 1680 0000 7671 1975 and Electronic copy

April 15, 2014

Mr. Gerald Ruopp
 Techalloy Company, Inc.
 6509 Olson Road
 Union, Illinois 60180

United State Environmental Protection Agency's Comments 2012 RCRA Corrective Measures Implementation Status Revised Report
EPA ID # ILD 005 178 975, Administrative Order on Consent (AOC),
Docket No. R8H-5-99-008

Dear Mr. Ruopp,

This letter provides the United States Environmental Protection Agency (EPA's) comments on the 2012 RCRA Corrective Measures Implementation Status Report for the Techalloy facility in Union, Illinois prepared by Autumnwood Consultants, Revision 1, dated April 2014. The report does a good job of answering EPA's previous comments on the original report. EPA's comments are:

1. Page 11 and page 12--both pages contain text with the statements "Irrigation and residential wells were sampled by purging three water column volumes from the well prior to sampling". This statement is factually incorrect and should be deleted from the report.
2. Figure 5-7. The EPA requested geologic information to be presented on a cross section that includes the entire length of the plume. This cross section (and the others) does not include geologic information; it does not include the plant area as requested, revise the cross section. The label for the y-axis calls this section B-B', which is incorrect. The title for this figure is uninformative and should be changed to something like "Figure. 5-7. Hydrogeology and distribution of VOCs along line of section A-A', in the vicinity of the Central Wire facility, Union, Illinois, 2012-2013".

3. Figure 5-8. Delete the GP-17 and GP-19, they are well off line and provide no additional insight beyond GP16 and GP20. The values of the VOC contours are not provided, or are incompletely provided. Contouring on B-B' at GP-16 and GP-17 is wrong. Figure caption should be changed.
4. Table 2-1. There appears to be a decrease in the average daily flow since September 2012. Why is the average flow rare decreasing? How does this change effect the size of the capture zone relative to the plume? Provide a capture zone analysis to support your conclusion.
5. Attachment 3--a "Summary of Monitoring Well Data..." should include information on all the monitoring wells, not just three. The report should include a single table with pertinent information for all the monitoring wells. This information should ideally include name, land surface altitude, depth of screened interval, well diameter, construction material, and altitude of top of well casing.
6. Dates of all water-level measurements should be provided.

A reply is required in 30-days. Should you have any questions, regarding this letter, need any additional information, or wish to discuss this matter further, please contact me at (312) 353-1243 or contact me by email to nordine.john@epa.gov.

Sincerely,



John Nordine, CPG, LPG
Project Manager
Corrective Action Section 2

Cc: Karen Peaceman, U.S. EPA
Jack Thorsen, Autumnwood ESH Consultants